

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA,)	CIVIL ACTION NO.: 3:23-cv-04987-JFA
)	
Plaintiff,)	
)	
v.)	
)	
\$524,015.40 IN UNITED)	
STATES CURRENCY,)	
)	
Defendant <i>in rem</i> .)	

STIPULATION FOR COMPROMISE SETTLEMENT AND JOINT MOTION
FOR ENTRY OF CONSENT ORDER OF FORFEITURE

WHEREAS, on Septemebr 21, 2022 officers of the Drug Enforcement Administration identified and searched the real property known and numbered as 2795 Peachtree Road, NE, Unit 909, Atlanta, GA, TMS#: 17-0100-0004-124-7 ("Atlanta Property"). In August of 2023, sole owner of the Atlanta Property and claimant, Victor Ernesto Villagomez Sanchez, sold it to a third party. Based on agreement of the parties, the sales proceeds due to Victor Ernesto Villagomez Sanchez were issued to the U.S. Marshals Service ("USMS") for holding pending the resolution of a forfeiture action. The sale proceeds total \$524,015.40 ("Defendant Currency").

WHEREAS, the within civil forfeiture action was filed October 5, 2023 alleging that the Defendant Currency is forfeitable pursuant to 21 U.S.C. ' 881(a) and 18 U.S.C. ' 981.

WHEREAS, Victor Ernesto Villagomez Sanchez now desires to settle and compromise this action involving the forfeiture of the Defendant Currency;

WHEREAS, Victor Ernesto Villagomez Sanchez denies any culpability or wrongdoing, but wishes to resolve the matter without further investigation, action and/or litigation;

NOW THEREFORE, the United States of America, on the one hand, and Victor Ernesto Villagomez Sanchez on the other hand, agree and STIPULATE to settle and compromise the action as follows:

1. The United States of America agrees to consent to the return of \$314,409.24 of the Defendant Currency to Victor Ernesto Villagomez Sanchez by electronic funds transfer payment from the United States to a trust account held in the name of Law Offices of Nathan S. Williams, counsel for Victor Ernesto Villagomez Sanchez.

2. Victor Ernesto Villagomez Sanchez agrees to consent to the entry of a Consent Order of Forfeiture condemning, quit-claiming, and abandoning the balance of the Defendant Currency, to wit, \$209,606.16, to the United States, to be disposed of by the USMS pursuant to law as a forfeited asset.

3. Victor Ernesto Villagomez Sanchez agrees to accept these terms in full settlement and satisfaction of any and all claims and demands which he, his heirs or assigns may have against the United States of America, its

agents and employees, on account of the arrest and seizure of the Defendant Currency.

4. Victor Ernesto Villagomez Sanchez hereby releases, forever discharges, and holds harmless the United States of America, USAO, the DEA, and the Dekalb County Police Department, their defendants, agencies, officers, attorneys, agents, servants, employees, successors and assigns, from any and all claims, demands, damages, causes of action or suits, of whatever kind and description, and wheresoever situated, which he, his heirs or assigns, or any third party ever had, now have, or may have in the future in connection with the seizure, arrest, detention, and forfeiture and/or return of the Defendant Currency as provided herein.

5. The intent and purpose of this Stipulation is to forfeit \$209,606.16 of the Defendant Currency to the United States, and to return \$314,409.24 to Victor Ernesto Villagomez Sanchez, while simultaneously protecting the United States of America and its present and former employees, agents, servants and personnel from any claims or suits related to this action.

6. The parties each agree to bear their own costs.

7. Victor Ernesto Villagomez Sanchez agrees to execute any and all documents necessary to effectuate the intent of this Stipulation.

8. Federal law requires the Department of the Treasury and other disbursing officials to offset Federal payments to collect delinquent tax and

non-tax debts owed to the United States, and to individual states (including past-due child support). If an offset is made to the payment to be made pursuant to this agreement, the party will receive a notification from the Department of the Treasury at the last address provided by the party to the governmental agency or entity to whom the offset payment is made. If the party believes that the payment may be subject to an offset, the party may contact the Treasury Department at 1-800-304-3107. The terms of this settlement do not affect the tax obligations fines, penalties or any other monetary obligations the party owes to the United States or any individual state.

9. The United States of America and Victor Ernesto Villagomez Sanchez move the Court for the entry of a Consent Order of Forfeiture.

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

1/17/2025

Date

By: s/Carrie Fisher Sherard
Carrie Fisher Sherard #10134
Assistant United States Attorney
Attorneys for the United States

1/16/2025

Date

Nathan Williams
Nathan Stuart Williams
Attorney for Victor Ernesto Villagomez
Sanchez

16/1/2025
Date

[Signature]
Victor Ernesto Villagomez Sanchez
Claimant